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January 12, 2021

VIA ECF

The Honorable Lorna G. Schofield
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Ramirez v. Group Short Term Disability, Long Term Disability
and Life Plan for Employees of ZB Company, Inc., et al.
Case No.: 20-cv-09624 (LGS)

Dear Judge Schofield:

The undersigned represents plaintiff Glenda Ramirez in the above-referenced ERISA disability action, with respect to which an initial conference is currently scheduled for January 21 (with a pre-conference letter due January 14). The purpose of this letter is to request, for the reasons set forth below, that the conference be adjourned to a date in early- to mid-February.

Defendant Hartford Life and Accident Insurance Company ("Hartford Life") is on extension until January 29 to respond to the complaint, and the parties are in discussions to streamline the action by making Hartford Life the only defendant. Moreover, this office intends to file an amended complaint that, in addition to removing the plan and plan administrator from the case (assuming our discussions conclude with an agreement to do so), will add a third cause of action.

This is the first adjournment request, and it is made with the consent of counsel for Hartford Life. There are no other scheduled dates that would be affected by the adjournment.

The application is **GRANTED**. The initial pre-trial conference scheduled for January 21, 2021, (Dkt. No. 6), is **ADJOURNED to February 11, 2021, at 10:40 a.m.** The conference will be telephonic and will occur on the following conference line: 888-363-4749, access code: 5583333. The time of the conference is approximate but the parties shall be prepared to begin at the scheduled time.

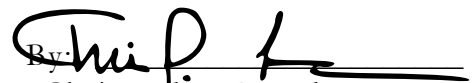
By **February 4, 2021**, the parties shall file the joint letter and proposed case management plan.

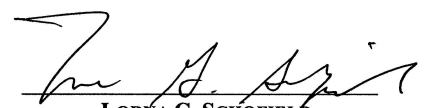
The Clerk of Court is respectfully directed to close the motion at Docket No. 9.

Dated: January 13, 2021
New York, New York

Respectfully submitted,

LAW OFFICE OF
CHRISTOPHER P. FOLEY, LLC

By 
Christopher P. Foley


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE